

**EXHIBIT “A”****RICO STATEMENT****QUESTION # 2**

<b>DEFENDANT</b>	<b>MISCONDUCT</b>	<b>BASIS OF LIABILITY</b>
Al Baraka	<p>Headed by defendant Kamel, Al Baraka is a wholly owned subsidiary of Dallah. Al Baraka has for many years knowingly maintained accounts for many of the so-called charities that operate within al Qaida’s infrastructure. Al Baraka advertises the existence and numerical designations of the accounts it maintains for those charities throughout the Muslim world, and provides a mechanism to allow al Qaida’s supporters to deposit funds directly into those accounts. Through this mechanism, Al Baraka facilitates al Qaida’s fundraising efforts. The accounts maintained by Al Baraka on behalf of the so-called charities have been used to transfer funds to al Qaida cells throughout the world. Despite its knowledge that the accounts it maintains were being used to fund terrorism, Al Baraka has continued to maintain those accounts, and has knowingly provided financial services and other forms of material support to al Qaida. In addition, Al Baraka has provided substantial support to al Qaida through its subsidiaries and affiliates, including Al Shamal Islamic Bank, Tadamon Islamic Bank and al Aqsa Bank. Thus, Al Baraka has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization’s global jihad. Along with Kamel, Al Baraka is also a shareholder in Tadamon Islamic Bank, which has long provided financial services and other forms of material support to al Qaida. Along with Kamel, Al Baraka is an investor in Al Shamal Bank, along with Osama bin Laden, Omar Abdullah Kamel, al Faisal Islamic Bank and</p>	<p>1962(c) 1962(d)</p>

	the Sudanese Government.	
Dallah	<p>Dallah is at the center of a complex banking system through which, beginning in the early 1980's, Saudi Arabia channeled massive financial support for the spread of Wahhabism, the radical brand of Islam at the heart of the al Qaida ideology. Endowed with enormous funding, Dallah gave extensive support for radial Islamic causes.</p> <p>Upon information and belief, Dallah, through its subsidiary Dallah Avco, also directly financed some of the September 11<sup>th</sup> hijackers. According to senior officials within the United States government, the Joint Congressional Inquiry into the September 11<sup>th</sup> attack revealed that a Saudi intelligence official named Omar al Bayoumi provided direct assistance to Kalid al-Midhar and Nawaf Al Hazmi, two of the September 11<sup>th</sup> hijackers. When al-Midhar and Al Hazmi arrived in Los Angeles, Al-Bayoumi, a Saudi citizen and prominent member of San Diego's Muslim community, traveled to Los Angeles to meet them. Immediately before doing so, Al-Bayoumi visited the Saudi consulate in Los Angeles. At the consulate, Al-Bayoumi met with Fahad Al-Thumairy, a Saudi diplomat who was stripped of his diplomatic visa and later barred from the United States, based on suspected ties to terrorism. Following their meeting, Al-Bayoumi facilitated the future hijackers' settlement in the San Diego community, and paid two months rent for an apartment on their behalf. According to various sources, Al-Bayoumi is an intelligence agent of the Kingdom of Saudi Arabia. There is substantial credible evidence to support this conclusion. In or around 1994, Al-Bayoumi was hired by Dallah Avco, a division of the Dallah al-Baraka business group, to work on an aviation project commissioned by the Saudi government. Al-Bayoumi remained in the employment of Dallah Avco for the next seven years. For five of those seven years, the Saudi government reimbursed Dallah Avco for Al-</p>	<p>1962(c)</p> <p>1962(d)</p>

	<p>Bayoumi's salary and Al-Bayoumi was considered a Saudi civil servant. Mysteriously, although the project for which Al-Bayoumi was allegedly hired was based in Saudi Arabia, Al-Bayoumi moved to the United States in August of 1994 and began taking English classes at San Diego State University's College of Extended Studies. Dallah Avco records indicate that, as of 1999, Dallah Avco sought to terminate Al-Bayoumi's annual employment contracts. To that end, a Dallah Avco official wrote to the Saudi aviation authority saying "the company is not willing to renew the period for another year and we wish this to be known." In response, the aviation authority sent an urgent letter advising Dallah Avco that the Saudi government wanted Al-Bayoumi's contract renewed "as quickly as possible." Witnesses have reported that Al-Bayoumi had access to "seemingly endless" funds while in the United States. In fact, despite the modest salary he was paid as a Dallah Avco employee, Al-Bayoumi was able to front \$400,000 for the purchase of a mosque. The Joint Inquiry's investigation also revealed that Al-Bayoumi received monthly checks in January 1999 from Princess Haifa, wife of Prince Bandar, through an intermediary named Osama Basnan. Some of the money Al-Bayoumi received from Princess Haifa ended up in the hands of the two September 11<sup>th</sup> hijackers.</p>	
Kamel	<p>Saleh Abdullah Kamel is a wealthy Saudi businessman and one of al Qaida's principal individual financiers. Kamel is Chairman of al Baraka Financial Institution, which is deeply involved in providing financial services and other forms of material support to al Qaida. Kamel also co-founded the U.S. branch of Sana-Bell, Inc., an enterprise established to provide revenues to sustain the U.S. operations of the International Islamic Relief Organization (the "IIRO"). In founding Sana-Bell, Inc., Kamel knew and intended that it would be used as a vehicle for funding terrorist</p>	

	<p>organizations, including al Qaida, through the IIRO and the SAAR Network. Kamel has been identified as one of al Qaida's principal financiers, and has made substantial contributions to many of the so-called charities operating within al Qaida's infrastructure, with full knowledge that those funds would be used to support al Qaida's operations and terrorist attacks, the culmination of which was the Attack.</p>	
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